

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

M.B., et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2:17-cv-04102-NKL
)	
Jennifer Tidball, et al.,)	
)	
Defendants.)	

**PLAINTIFFS' UNOPPOSED MOTION FOR APPROVAL OF NOTICE TO CLASS
MEMBERS OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES**

Federal Rule of Civil Procedure 23(h) provides that “the court may award reasonable attorney’s fees and nontaxable costs that are authorized by the law or the parties’ agreement.” Rule 23(h) further requires that any claim for such an award must be made by motion and that “[n]otice of the motion must be served on all parties and, for motions by class counsel, directed to class members in a reasonable manner.” Class members “may object to the motion.” *Id.*; *see also Barrett v. Claycomb*, No. 2:11-CV-04242-NKL, 2013 WL 6920860, at *8 (W.D. Mo., Dec. 9, 2013).

The parties have conferred and agree that reasonable notice to class members in this case would be satisfied by posting of the “Notice of Filing of Plaintiffs’ Motion for Attorneys’ Fees and Expenses,” attached as Exhibit 1 (“the Notice”), on the parties’ websites, in all Children’s Division main, regional, and county offices, and by distributing the Notice to be posted in Missouri Circuit, Juvenile, and Family Courts, and the offices of Juvenile Officers. Plaintiffs respectfully request that the Court enter the Proposed Order Directing Class Notice of Plaintiffs’ Motion for Attorneys’ Fees and Expenses. The Proposed Order will authorize the form and manner of a Notice of Plaintiffs’ Motion for Attorneys’ Fees and Expenses to class members and establish a schedule for submission of objections and responses.

DATED: November 27, 2019

Respectfully submitted by:

CHILDREN'S RIGHTS, INC.

/s/ Elizabeth Pitman Gretter

Elizabeth Pitman Gretter, *admitted pro hac vice*

Samantha M. Bartosz, *admitted pro hac vice*

Stephen Dixon, *admitted pro hac vice*

Aaron Finch, *admitted pro hac vice*

Erin McGuinness, *admitted pro hac vice*

Danielle Rosenthal, *admitted pro hac vice*

Daniele Gerard, *admitted pro hac vice*

Jonathan King, *admitted pro hac vice*

88 Pine Street, Suite 800

New York, New York 10005

(212) 683-2210

(212) 683-4015 (fax)

egretter@childrensrights.org

sbartosz@childrensrights.org

sdixon@childrensrights.org

afinch@childrensrights.org

emcguinness@childrensrights.org

drosenthal@childrensrights.org

dgerard@childrensrights.org

jking@childrensrights.org

SAINT LOUIS UNIVERSITY LEGAL CLINIC

John J. Ammann, MO Bar No. 34308

100 N. Tucker Blvd., Suite 704

Saint Louis, MO 63101-1911

(314) 977-2778

(314) 977-1180 (fax)

ammannjj@slu.edu

NATIONAL CENTER FOR YOUTH LAW

Leecia Welch, *admitted pro hac vice*

Poonam Juneja, *admitted pro hac vice*

Freya Pitts, *admitted pro hac vice*

405 14th Street, 15th Floor

Oakland, California 94612
(510) 835-8098
(510) 835-8099 (fax)
lwelch@youthlaw.org
pjuneja@youthlaw.org
fpitts@youthlaw.org

MORGAN, LEWIS & BOCKIUS LLP

Scott T. Schutte, *admitted pro hac vice*
77 West Wacker Drive, 5th Floor
Chicago, IL 60601
(312) 324-1000
scott.schutte@morganlewis.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certify that a copy of the foregoing was filed electronically with the Clerk of the Court on November 27, 2019, to be served by the operation of the Court's CM/ECF electronic filing system upon all parties.

/s/ Elizabeth Pitman Gretter